

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION

IN RE REGIONS MORGAN KEEGAN SECURITIES, DERIVATIVE and ERISA LITIGATION

MDL Docket No. 2009

This Document Relates to:

Landers v. Morgan Asset Management, Inc., No. 2:08-cv-02260-SHM-dkv

**MOTION OF DEFENDANTS JACK R. BLAIR, ALBERT C. JOHNSON,
JAMES STILLMAN R. MCFADDEN, W. RANDALL PITTMAN,
MARY S. STONE, AND ARCHIE W. WILLIS, III TO DISMISS PLAINTIFFS'
FIRST AMENDED DERIVATIVE COMPLAINT**

Defendants Jack R. Blair, Albert C. Johnson, James Stillman R. McFadden, W. Randall Pittman, Mary S. Stone, and Archie W. Willis, III by their undersigned counsel, respectfully move the Court for an Order dismissing this action. Plaintiffs lack standing to proceed with this purported shareholder derivative action, particularly as a result of the election of a new board of directors and that new board's decision to halt this lawsuit. In the alternative, dismissal of this action against these defendants is proper, as the complaint fails to state a claim against these defendants upon which relief may be granted.

Defendants respectfully request the court dismiss this action. Defendants submit herewith a Memorandum of Law in support of this motion.

DATED this 15th day of December 2009.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2009, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following and/or serve the following via U.S. Mail:

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